

quinn emanuel trial lawyers | miami

2601 S. Bayshore Drive, Suite 1550, Miami, Florida 33133-5417 | TEL (305) 402-4880 FAX (305) 901-2975

WRITER'S DIRECT DIAL NO.
(305) 402-3848

WRITER'S EMAIL ADDRESS
kirstennelson@quinnmanuel.com

May 22, 2025

VIA ECF

Hon. Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Charlie Javice and Olivier Amar, 23 Cr. 251 (AKH)

Dear Judge Hellerstein:

Defendant Charlie Javice respectfully submits this letter to request a short adjournment of the briefing and hearing schedule related to Defendants' Rule 29 and Rule 33 motions in order to address the opinion of the Supreme Court of the United States in *Kousisis v. United States*, published today, May 22, 2025, attached hereto as Exhibit A. The decision in *Kousisis* directly implicates issues core to Ms. Javice's post-trial briefing, namely the elements of wire fraud and conspiracy to commit wire fraud under 18 U.S.C. §§1343 and 1349.

Ms. Javice proposes the following modified deadlines:

- Defendants' reply briefs due **May 30, 2025** (currently due May 23, 2025); and
- Hearing on **June 12 or 13, 2025** (currently set for May 29, 2025).

Counsel for Mr. Amar has informed us that he joins in this request. Counsel for the government opposes the motion. Should the Court grant the motion, Ms. Javice and Mr. Amar would not oppose an opportunity for the government to file a sur-reply responding to any *Kousisis*-specific arguments raised in the reply briefing.

[Intentionally left blank.]

Respectfully submitted,

/s/ Kirsten R. Nelson

Kirsten R. Nelson* (*pro hac vice*)
2601 South Bayshore Drive, Suite 1550
Miami, FL 33133
Telephone: (305)402-4880
kirstennelson@quinnmanuel.com

* Not admitted in Florida. A member in good standing in
Maryland and the District of Columbia